

## Pharmacy Business Ownership Bill 2023

**Submission No:** 13  
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Committee Secretary  
Economics and Governance Committee  
Parliament House  
George Street  
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Via: [<EGC@parliament.qld.gov.au>](mailto:EGC@parliament.qld.gov.au)

Dear Sir/Madam,

**RE: Committee inquiry into the Pharmacy Business Ownership Bill 2023**

As a young and recent pharmacy owner in Queensland, I look forward to a strong pharmacy industry in Queensland and believe that the introduction of this Bill and Council is a positive step. Largely, the Pharmacy Business Ownership Bill 2023 is good but there are a few sections that require reviewing as outlined in this letter. These changes will ensure that the Bill can meet its objective to help promote the professional, safe, and competent provision of pharmacy services and maintain public confidence in the pharmacy profession.

The definition of *core pharmacy services (Clause 8(3))*, does not adequately define what a pharmacy service is. The definition is far too narrow and is limited to the dispensing and compounding of medicines. To ensure that the objective of the Bill is able to be fulfilled, the definition must be changed to reflect what a modern pharmacist does. This includes dispensing, compounding, supplying, prescribing, administering, repackaging, possessing, disposing and the provision of clinical services and advice. This Bill aims to describe who may own a business and therefore a comprehensive and accurate definition of the business and its services must be included otherwise anything other than dispensing and compounding will be outside of the regulatory control of the Bill.

The definition of *supermarket* in Clause 11(3), is not broad enough to capture the online businesses. To ensure that neither online or physical supermarkets are granted a pharmacy licence, then the definition within the Bill must make specific reference to both online and physical premises otherwise it is at risk of being left up to interpretation.

*Clause 13 What is a material interest in a pharmacy business* does not adequately capture what the material interest could be. The scope of this definition is too narrow and therefore may lead to individuals or companies having an interest in a pharmacy that can not be deemed unlawful by the Council. I would like to see an amendment to this definition to include the words **legal** and **beneficial** and/or *an interest includes, but is not limited to, having a right to receive consideration directly or indirectly that varies according to the profits or takings of the pharmacy business.*

As outlined earlier, one of the main objectives of this bill is to maintain public confidence in the pharmacy profession, and therefore I believe that having a mandatory public register of all licenced pharmacies in Queensland and the owner/s of that business should be available. This then creates transparency for the public and accountability for the owners of their businesses.

I have previously worked in NSW and the remit of the Pharmacy Council is too broad and the QLD council must limit their ability to the registration and licencing of pharmacy businesses. The function of the council will be diluted is the scope begins to creep into other acts that therefore clause 147 (1)(g) must be amended to include *any other function given to the council under this Act.*

Finally, I believe that the council member must ensure they remain up to date and relevant and therefore the majority should be made up of practicing pharmacy owners who can only serve a maximum of 2 consecutive terms. This must be written into the Bill to further ensure the council is able to achieve the Bills objectives.

I appreciate you taking the time to review this submission and I look forward to the revised Bill and the subsequent implementation of it.

Yours sincerely,

Linda Lee

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